

## REMARKS

Claims 1-28 of the patent application were presented for examination. In the Office Action of June 5, 2007, claims 1-28 were rejected. The claims, as amended, are listed above. No new matter has been added. Accordingly, claims 1-28 are now pending for examination.

Applicant respectfully requests reconsideration of the pending claims and responds to the Office Action as follows:

### Rejections Under 35 USC § 103

In paragraph 4, claims 1, 2, 4-16 and 18-28 were rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 5,835,757 issued to Oulid-Aissa ("Oulid-Aissa") in view of US Patent No. 6,182,086 issued to Lomet et al. ("Lomet"). Applicant respectfully traverses the rejections. In summary, while the single database connection in claim 1 receives statements from multiple application sources, the references only disclose receiving statements from a single application.

Independent claim 1 is representative of independent claims 8, 15 and 22. Specifically, claim 1 is directed towards a method for avoiding section collision for application server requests over a single database connection. The method comprises:

- (a) receiving a first statement assigned a first command source identifier by a database server from a first application source over a single database connection between the database server and an application server;
- (b) receiving a second statement assigned a second command source identifier by the database server from a second application source over the single database connection, wherein the first statement is substantially identical to the second statement; and

- (c) executing the first statement assigned a first command source identifier separately from and in parallel with the second statement assigned the second command source without section collision.

Advantageously, multiple instances of the same cursor can be processed without section collision.

A. Oulid-Aissa

Oulid-Aissa generally discloses a distributed database management system (DDBMS) system for switching applications (Abstract). More specifically, Oulid-Aissa discloses a Database Interface (DBIF) 302 to handle application request for database services (12:32-33). The DDBMS is distributed across multiple nodes on a back-end of the system, but appears as a single logical node to an application (10:12-17). A control mechanism in DBIF 302 allows an application to combine several database accesses into an atomic transaction (10:30-32). Thus, Oulid-Aissa discloses DBIF to interface a single application to a database across multiple nodes.

However, Oulid-Aissa fails to teach or disclose the invention as recited in claim 1. For example, claim 1 recites “receiving a first statement...from a first application source [and]...receiving a second statement...from a second application source.” A database server interfaces with an application on a front-end and a database on a back-end. The application interface of claim 1 can handle multiple statements from a front-end of a database system (e.g., FIGS. 7-8). On the other hand, the DBIF of Oulid-Aissa handles a single application on the front-end of a DDBM system and multiple applications on the back-end. In particular, Oulid-Aissa states that the DDBMS “coordinates data accesses when it updates data across multiple nodes in order to construct an application view” (10:12-17). In the portion of Oulid-Aissa relied upon by Examiner, commands are combined for atomic transactions (10:28-32), but these commands are received from a single application (i.e., “an application” 10:20).

Claim 1 also recites “a first command source identifier” and a “second command source identifier” associated with first and second statements respectively. The command source identifiers provide differentiation between application sources. Yet, Oulid-Aissa fails to contemplate such as differentiation. The portion of Oulid-Aissa relied upon by Examiner merely describes transaction processing of a single application request (“the application request” in 31:8; and application 301 in FIG. 18). Although some figures in Oulid-Aissa show more than one application in communication with the system (e.g., FIG. 5), the communication protocol fails to contemplate a technique for communication over a single database connection.

Moreover, claim 1 recites “wherein the first statement is substantially identical to the second statement.” Oulid-Aissa fails to contemplate, and Examiner does not assert, that statements from various sources can be substantially identical.

#### B. Lomet

Lomet generally discloses a client-server system having one or more clients connected to one or more servers (Abstract). Messages between the client and server are tagged with a unique application identifier and a message sequence number (10:19-21). A client running multiple applications receives an application identifier to use for communication (10:25-30). Thus, Lomet discloses communication with several applications.

However, Lomet fails to cure the deficiencies of Oulid-Aissa. Namely, claim 1 recites first and second “application sources” having first and second “command source identifiers.” In claim 1, the command source identifiers allow two application sources from the same application to operate at the same time. To the contrary, the unique application identifier of Lomet cannot distinguish different sources from within an application. Problematically, using Lomet, statements from different sources can result in section collision—the problem solved by the invention as recited. Thus, the unique application identifier of

Lomet fails to disclose at least the first and second command source identifiers of claim 1.

Therefore, Applicant submits that, as amended, independent claim 1, and related dependent claims, are patentable over the combination of Ouild-Aissa and Lomet, and the other prior art of record. Similarly, independent claims 8, 15 and 22, and related dependent claims, are patentable for at least the same reasons as claim 1.

## **CONCLUSION**

Applicant's attorney believes this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,

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